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November 15, 2024

VIA FAX & ECF

Hon. Ronnie Abrams.
United States District Court
Southern District of New York
40 Foley Square, Room 2203
New York, NY 10007

Re: *Morrissey v. A&E Television Networks, LLC, et al.*, No. 1:24-cv-07856

Dear Judge Abrams:

We are counsel to Defendant-Counterclaimants A&E Television Networks, LLC, Lifetime Entertainment Services, LLC, Entertainment One Reality Productions, LLC, Creature Films, Inc, and Mark Ford (together, “Defendants”). We write pursuant to Rule 5(iii) of Your Honor’s Individual Rules and Practices in Civil Cases to request leave to file redacted versions of the following documents on the public docket, with the original documents to remain under seal:

- A&E Television Networks, LLC and Lifetime Entertainment Services, LLC’s Verified Answer and Affirmative Defenses to Plaintiff’s Amended Complaint and Counterclaim
- Entertainment One Reality Productions, LLC’s Verified Answer and Affirmative Defenses to Plaintiff’s Amended Complaint and Counterclaim
- Creature Films, Inc, and Mark Ford’s Verified Answer and Affirmative Defenses to Plaintiff’s Amended Complaint and Counterclaim

Defendants make this request because these pleadings include references to documents and allegations in Plaintiff’s Verified Amended Complaint and exhibits thereto which have been filed under seal, pending a determination by this Court that they should remain under seal. At Plaintiff’s request, Defendants have redacted these references.

Defendants do not, however, take any position as to whether the material should remain under seal. Plaintiff is aware of her obligation under Rule 5(i) of Your Honor’s Individual Rules and Practices in Civil Cases to file a letter within three days explaining the need for these redactions. Defendants defer to Your Honor’s determination of whether Plaintiff meets her burden of demonstrating that the redactions are “necessary to preserve higher values and . . .

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narrowly tailored to achieve that aim." *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 124 (2d Cir. 2006).

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Abigail B. Everdell

Abigail B. Everdell

Application granted. Pending resolution of the motion to seal, the aforementioned documents will be temporarily sealed. No later than November 19, 2024, Plaintiff shall file a letter justifying the need to seal each of these documents so the Court may "conduct an individualized review," *Brown v. Maxwell*, 929 F.3d 41, 51 (2d Cir. 2019), and make "specific, on-the-record findings" as to whether, and the extent to which, sealing is appropriate, *Lugosch*, 435 F.3d at 126. Plaintiff may, at its discretion, file a single letter in support of sealing the aforementioned documents as well as the documents identified in Defendants' prior letter motion, ECF No. 24.

SO ORDERED.


Hon. Ronnie Abrams
November 18, 2024